

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**GUILLERMO GANDARA, JR.**

**a.k.a. “Willie”, a.k.a. “Godfather” (1),**

**Defendant.**

§  
§  
§  
§  
§  
§  
§  
§  
§

**CRIMINAL NO. EP-12-CR-0324-FM**

**GOVERNMENT’S FORFEITURE BILL OF PARTICULARS**

The United States of America, by and through its attorney Robert Pitman, United States Attorney for the Western District of Texas, and the undersigned Assistant United States Attorneys, respectfully gives notice that the property subject to forfeiture as a result of the offenses alleged in Counts One through Five of the Superseding Indictment, as alleged in the Notice of Government’s Demand for Forfeiture in the Indictment, includes but is not limited to the following additional property:

- a. \$5,400.00, more or less, in United States Currency, which was seized from Guillermo Gandara, Jr., on or about February 22, 2012;**
- b. \$2,540.00, more or less, in United States Currency, which was seized from Guillermo Gandara, Jr., on or about February 22, 2012;**
- c. one 2007 Hummer H2, bearing Vehicle Identification Number (“VIN”) 5GRGN23UX7H112776; and**
- d. one 1999 Ford Expedition, bearing VIN 1FMPU18L1XLB26878**

- e. **All right, title, and interest in 1.41 acres, more or less, of Tract 6-B-3, in Block 1, Socorro Grant, being more particularly described in Volume 1247, Page 1049, Deed Records of El Paso County, Texas.**

Dated: El Paso, Texas  
June 13, 2012

Respectfully submitted,

ROBERT PITMAN  
United States Attorney

By:                     /s/                      
Anna E. Arreola  
New York Registration No. 4151775  
Michael Rose Whyte  
Texas Bar No. 24051822  
Assistant United States Attorneys  
700 E. San Antonio, Suite 200  
El Paso, Texas 79901  
Tel: (915) 534-6884

**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2012, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System, which will transmit notification of such filing to the following CM/ECF participant:

Joe A. Spencer, Jr., Attorney for Guillermo Gandara, Jr.  
Attorney at Law  
1009 Montana  
El Paso, TX 79902

  /s/    
Anna E. Arreola  
Assistant United States Attorney